

1 Ahilan T. Arulanantham (SBN 237841)
 arulanantham@law.ucla.edu
 2 CENTER FOR IMMIGRATION LAW AND
 POLICY, UCLA SCHOOL OF LAW
 3 385 Charles E. Young Dr. East
 Los Angeles, CA 90095
 4 Telephone: (310) 825-1029

5 Emilou MacLean (SBN 319071)
 emaclean@aclunc.org
 6 Michelle (Minju) Y. Cho (SBN 321939)
 mcho@aclunc.org
 7 Amanda Young (SBN 359753)
 ayoung@aclunc.org
 8 ACLU FOUNDATION
 OF NORTHERN CALIFORNIA
 9 39 Drumm Street
 San Francisco, CA 94111-4805
 10 Telephone: (415) 621-2493
 Facsimile: (415) 863-7832

11 Attorneys for Plaintiffs
 12 [Additional Counsel Listed on Next Page]

Yaakov M. Roth
 Acting Assistant Attorney General
 Civil Division
 Sarah L. Vuong (CA Bar 258528)
 Assistant Director
 William H. Weiland (MA Bar 661433)
 Senior Litigation Counsel
 Lauren Bryant (NY Bar 5321880)
 Anna Dichter (NJ Bar 304442019)
 Jeffrey Hartman (WA Bar 49810)
 Catherine Ross (DC Bar 9007404)
 Amanda Saylor (FL Bar 1031480)
 Eric Snyderman (VA Bar 99563)
 Trial Attorneys
 U.S. Department of Justice, Civil Division
 Office of Immigration Litigation
 General Litigation and Appeals Section
 P.O. Box 868, Ben Franklin Station
 Washington, DC 20044

Attorneys for Defendants

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN FRANCISCO DIVISION

16
 17 NATIONAL TPS ALLIANCE, MARIELA
 GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
 M.H., CECILIA DANIELA GONZÁLEZ
 HERRERA, ALBA CECILIA PURICA
 HERNÁNDEZ, E.R., HENDRINA VIVAS
 CASTILLO, A.C.A., SHERIKA BLANC, VILES
 20 DORSAINVIL, and G.S.,

21 Plaintiffs,

22 vs.

23 KRISTI NOEM, in her official capacity as
 24 Secretary of Homeland Security, UNITED
 STATES DEPARTMENT OF HOMELAND
 SECURITY, and UNITED STATES OF
 25 AMERICA,

26 Defendants.

Case No. 3:25-cv-01766-EMC

**STIPULATION AND ~~PROPOSED~~
 ORDER RE: BRIEFING SCHEDULE FOR
 PARTIES' CROSS-MOTIONS FOR
 SUMMARY JUDGMENT**

Assigned to: Hon. Edward M. Chen

Complaint filed: February 19, 2025

1 Additional Counsel for Plaintiffs

2 Jessica Karp Bansal (SBN 277347)

jessica@ndlon.org

3 Lauren Michel Wilfong (*Pro Hac Vice*)

lwilfong@ndlon.org

4 NATIONAL DAY LABORER

ORGANIZING NETWORK

5 1030 S. Arroyo Parkway, Suite 106

Pasadena, CA 91105

6 Telephone: (626) 214-5689

7 Eva L. Bitran (SBN 302081)

ebitran@aclusocal.org

8 Diana Sanchez (SBN 338871)

dianasanchez@aclusocal.org

9 ACLU FOUNDATION

OF SOUTHERN CALIFORNIA

10 1313 West 8th Street

Los Angeles, CA 90017

11 Telephone: (213) 977-5236

12 Erik Crew (*Pro Hac Vice*)

ecrew@haitianbridge.org

13 HAITIAN BRIDGE ALLIANCE

4560 Alvarado Canyon Road, 1H

14 San Diego, CA 92120

Telephone: (949) 603-741

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 Pursuant to Civ. L.R. 6-1(b), 6-2 and 7-12, the Parties, by and through their respective
 2 counsel, submit this stipulation and [proposed] order regarding the briefing schedule for the Parties'
 3 cross-motions for summary judgment.

4 **WHEREAS**, on April 30, 2025, pursuant to the Parties' stipulation, this Court set the
 5 following briefing schedule for the Parties' Cross-Motions for Summary Judgment:

- 6 • Plaintiffs shall file their Motion for Summary Judgment on or before May 26, 2025.
- 7 • Defendants shall file an Opposition to Plaintiffs' Motion for Summary Judgment and their
 Motion for Summary Judgment on or before June 10, 2025.
- 8 • Plaintiffs shall file their Reply in further support of their Motion for Summary Judgment and
 their Opposition to Defendants' Motion for Summary Judgment on or before June 20, 2025.
- 9 • Defendants shall file their Reply to Plaintiffs' Opposition to Defendants' Motion for
 Summary Judgment on or before June 27, 2025.
- 10 • The Court shall hear argument on the Parties' Cross-Motions for Summary Judgment on July
 11, 2025. Dkt. 124.

15 **WHEREAS**, on May 9, 2025, this Court granted Parties' stipulated request that Plaintiffs file
 16 their Motion for Summary Judgment on or before May 27, 2025, in light of the Memorial Day
 17 holiday on May 26, 2025. The briefing schedule for the Parties' Cross-Motions for Summary
 18 Judgment otherwise remained the same. Dkt. 134.

19 **WHEREAS**, on May 19, 2025, pursuant to Court Order, (*see* Dkts. 135, 143), Defendants
 20 produced 77 documents responsive to Plaintiffs' first, second and sixth requests for production; and

21 **WHEREAS**, on May 22, 2025, Defendants' counsel emailed Plaintiffs' counsel to notify
 22 Plaintiffs that 159 documents from USCIS custodians that were potentially responsive to Plaintiffs'
 23 requests for production were inadvertently not batched out for review. Defendants' counsel stated
 24 that they intended to have the documents reviewed, and responsive, non-privileged documents
 25 produced, by May 27, 2025, and offered to adjust the briefing schedule on the Parties' cross-motions
 26 for summary judgment to accommodate this belated production.

27 **IT IS THEREFORE STIPULATED AND AGREED**, by the Parties and subject to the

1 approval of the Court:

- 2
- 3 • Plaintiffs shall file their Motion for Summary Judgment on or before June 3, 2025.
 - 4 • Defendants shall file their Opposition and Cross-Motion for Summary Judgment on or before
June 17, 2025.
 - 5 • Plaintiffs shall file their Reply in further support of their Motion for Summary Judgment and
their Opposition to Defendants' Motion for Summary Judgment on or before June 27, 2025.
 - 6 • Defendants will waive their Reply in further support of their Motion for Summary Judgment.
 - 7 • The Court will hear argument on the Parties' Cross-Motions for Summary Judgment on July
11, 2025.
- 8

9 IT IS SO STIPULATED.

10

11 Date: May 23, 2025

12 Respectfully submitted,

13

14 ACLU FOUNDATION
OF NORTHERN CALIFORNIA

15 _____
16 Emilou MacLean
17 Attorneys for Plaintiffs

18 Date: May 23, 2025

19 U.S. DEPARTMENT OF JUSTICE

20 _____
21 Anna Dichter
22 Attorneys for Defendants

23 **SIGNATURE ATTESTATION**

24 Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that each of the other Signatories have
25 concurred in the filing of this document.

26

27 ACLU FOUNDATION
28 OF NORTHERN CALIFORNIA

29 _____
30 Emilou MacLean

1 **[PROPOSED] ORDER**
2
3

PURSUANT TO STIPULATION, IT IS SO ORDERED.

4 Dated: May 27, 2025


5 The Honorable Edward M. Chen
United States District Judge

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28